



F. RODGERS INSULATION RESIDENTIAL, INC.

THERMAL INSULATION CONTRACTORS
Residential

May 6, 2002

Commissioner Robert Pernel
Commissioner Art Rosenfeld
Energy Efficiency Committee

Bill Pennington
Bryan Alcorn

California Energy Commission
1516 Ninth Street
Sacramento, CA. 95814-5512

RE: DOCKET NUMBER---01-BSTC-1; OPPOSITION COMMENTS TO APRIL 23RD.
STAFF WORKSHOP; FIRST GROUP OF MEASURE REPORTS---CONSTRUCTION
QUALITY-WALLS

Dear Commissioners:

I'm writing to express my opposition to the recent recommendations being made to reduce the effectiveness of insulation systems in the approved energy compliance methods because of perceived poor installation practices. The 10 site investigation used as evidence to support the claim of industry wide non-compliance with proper installation procedures is an insult to the hundreds of homes properly installed everyday statewide and do not reflect the kind of professional quality we exhibit in our work nor the quality expected by our builder clients and their customers.

It seems these recommendations are being made with a very limited, misguided information base and have labeled our work and our industry inaccurately. I am shocked that the staff workshop would represent to your Committee a report based on a 10 site investigation, out of over 106,000 single family homes built in California in 2001, and claim that their report is a true and real representation of the industries workmanship. That representation would also indicate that the Home Building Industry and the various statewide Building Inspection Agencies allow such workmanship to prevail.

Since the early 1980's California's Energy Efficiency Standards have recognized the great value insulation provides in reducing home energy usage and the resulting conservation of the states resources. Insulation is one of the most cost-effective measures that can be used for this purpose. F. Rodgers Insulation has provided professional insulation services to the Building Industry for over six years and prides itself in the quality and integrity of materials and installation practices used.

I have been a California licensed, C-2, Insulation Contractor since 1974. I have owned my own company and served in both Production and Sales Management positions with two of the state's largest Insulation Contracting companies. I can proudly state that I have never been associated with a company that would allow the poor level of workmanship as depicted in the report presented to you.

The recommendations recently made to you show uncharacteristic examples of installed fiberglass batt insulation and imply that every home is of such poor installation standards. I object to such an assertion.

Builders today require, through their own quality control programs, more exacting care in installed systems with tighter budgets allocated for quality work. The advent of "Defect Litigation" has forced quality workmanship from even those companies whose past installation techniques and tactics were less rigorous.

The recommendations being considered before you are based on inaccurate information and a misleading representation. They also incompletely describe and report on other installation systems being used in the industry.

Therefore I ask that you do not accept the recommendations presented before you to reduce the effective R-Value of wall insulation.

Sincerely,



Matt Sulston
Vice President
F. Rodgers Insulation Residential, Inc.